

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHARLES HERBERT PROCTOR, III and
SYNOVA ASSET MANAGEMENT,
LLC, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

JPMORGAN CHASE & CO., J.P.
MORGAN CLEARING CORP., J.P.
MORGAN SECURITIES LLC, J.P.
MORGAN FUTURES, INC. (now known
as J.P. MORGAN SECURITIES LLC),
and JOHN DOES 1-50,

Defendants.

Case No. 20 Civ. 05360 (PAE)
ECF Case

ROBERT CHARLES CLASS A, L.P., on
Behalf of Itself and All Others Similarly
Situating,

Plaintiff,

v.

J.P. MORGAN CHASE & CO., J.P.
MORGAN CLEARING CORP., J.P.
MORGAN SECURITIES LLC, J.P.
MORGAN FUTURES, INC. (now known
as J.P. MORGAN SECURITIES LLC),
and JOHN DOES 1-50,

Defendants.

Case No. 20 Civ. 05298 (PAE)
ECF Case

**NOTICE OF MOTION TO APPOINT
LOWEY DANNENBERG P.C. AND KIRBY McINERNEY LLP
AS INTERIM CO-LEAD COUNSEL**

THOMAS GRAMATIS, on Behalf of
himself and All Others Similarly Situated,

Plaintiff,

v.

JPMORGAN CHASE & CO., J.P.
MORGAN CLEARING CORP., J.P.
MORGAN SECURITIES LLC, J.P.
MORGAN FUTURES, INC. (now known
as J.P. MORGAN SECURITIES LLC),
and JOHN DOES 1-50,

Defendants.

Case No. 20 Civ. 05918 (PAE)
ECF Case

BUDO TRADING LLC, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

J.P. MORGAN CHASE & CO., J.P.
MORGAN CLEARING CORP., J.P.
MORGAN SECURITIES LLC, J.P.
MORGAN FUTURES, INC. (now known
as J.P. MORGAN SECURITIES LLC),
and JOHN DOES 1-50,

Defendants.

Case No. 20 Civ. 05772 (PAE)
ECF Case

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ENDEAVOR TRADING, LLC, individually
and on behalf of all those similarly situated,

Plaintiff,

v.

JPMORGAN CHASE & CO., J.P.
MORGAN CLEARING CORP., J.P.
MORGAN SECURITIES LLC, J.P.
MORGAN FUTURES, INC. (now known
as J.P. MORGAN SECURITIES LLC),
and JOHN DOES 1-50,

Defendants.

Case No. 20 Civ. 05285 (PAE)
ECF Case

JOHN GRACE, individually and on behalf of
all those similarly situated,

Plaintiff,

v.

JPMORGAN CHASE & CO., J.P.
MORGAN CLEARING CORP., J.P.
MORGAN SECURITIES LLC, J.P.
MORGAN FUTURES, INC. (now known
as J.P. MORGAN SECURITIES LLC),
and JOHN DOES 1-50,

Defendants.

Case No. 20 Civ. 04523 (PAE)
ECF Case

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BREAKWATER TRADING LLC,
individually and on behalf of all those
similarly situated,

Plaintiff,

v.

JPMORGAN CHASE & CO., J.P.
MORGAN CLEARING CORP., J.P.
MORGAN SECURITIES LLC, J.P.
MORGAN FUTURES, INC. (now known
as J.P. MORGAN SECURITIES LLC),
and JOHN DOES 1-50,

Defendants.

Case No. 20 Civ. 03515 (PAE)
ECF Case

PLEASE TAKE NOTICE that Plaintiffs Charles Herbert Proctor, III and Synova Asset Management, LLC, through their undersigned attorneys, will and do hereby move this Court before The Honorable Paul A. Engelmayer Courtroom 1305, at the United States Courthouse for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, at a time and date to be set by the Court, for entry of an Order: (1) appointing as Interim Co-Lead Counsel the firms of Lowey Dannenberg, P.C. and Kirby McInerney LLP (collectively, “Movants”), pursuant to Rule 23(g) of the Federal Rule of Civil Procedure; and (2) granting such other relief as the Court may deem appropriate.

Please take further notice, that, in support of this motion, Movants rely on this Notice of Motion, the accompanying Memorandum of Law, and the Declaration of Karen M. Lerner with attached exhibits, and all other papers and proceedings had herein.

Dated: August 21, 2020

KIRBY McINERNEY LLP

/s/ Karen M. Lerner

Karen M. Lerner

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Proctor, III and Synova Asset
Management, LLC*